



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

September 10, 1999

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: Comments - CDL for AIP2 Sector 3 Utility Trenches

Dear Mr. Reising:

Ohio EPA has reviewed DOE's September 7, 1999 submittal, "Certification Design Letter for Area I, Phase II Sector 3 Utility Trenches". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Donna Bohannon, Michelle Waller or me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

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CDL for AIP II Sector 3 Utility Trenches

General Comment

1. Commenting Organization: OEPA Commentor: OFFO
Section #: Pg. #: Line #: Code: C
Original Comment #:
Comment: Ohio EPA does not approve of the manner in which DOE has been managing soil operations recently, in regards to document submittals. This CDL is a prime example. The Sitewide Excavation Plan (SEP, July 1988) clearly states in section 7.3.2 that 'certification sampling and analysis will commence immediately *after a regulatory review and approval* of the CDL'. The work described in this CDL, received by the Ohio EPA on September 7, is currently being performed without any review or approval from the Agencies. This is becoming an all too common occurrence, and the Ohio EPA expects that from this point on, all documents and field work will follow the guidelines agreed upon in the SEP.

Specific Comments

2. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.0 Pg. #: 3 Line #: 20 Code: C
Original Comment #:
Comment: The four WAC sample locations referred to and shown on Figure 4 are approximately 100-150 feet apart. What criteria was used to determine the number of WAC samples and the distance between locations? When and under what document was this sampling performed? This information is not provided in the referenced section of the A1P II Supplemental Characterization Package. According to OEPA's files, we did not receive a PSP for sampling the STP Utility Trenches. Please clarify.
3. Commenting Organization: OEPA Commentor: OFFO
Section #: 2.0 Pg. #: 3 Line #: 8, 20 Code: C
Original Comment #:
Comment: Trench 5, which is mentioned in both of these sentences, does not appear on any map, nor anywhere else in this document. Section 1.2 references *five CUs, and four trenches*. Please clarify.
4. Commenting Organization: OEPA Commentor: OFFO

Section #:4.2 Pg. #: 7 Line #:31-32 Code: C

Original Comment #:

Comment: This sentence references a PSP for Certification Sampling of Area I, *Phase III* Sector 3 Utility Trench. The Agency has no record of this PSP, or any under the same title for *Phase II*. Please clarify.

5. Commenting Organization: OEPA Commentor: OFFO

Section #:4.2 Pg. #: 7 Line #: 37-38 Code: C

Original Comment #:

Comment: The sampling plan laid out here does not follow the plan as agreed upon in Section 4 of the A1P11 Supplemental Characterization Package. Instead of the certification sample being taken from a stockpile, FDF is to 'sample the last bucket removed from the trench bottom for FRLs'. Please correct.

6. Commenting Organization: OEPA Commentor: OFFO

Section #:4.3 Pg. #: 8 Line #:29-32 Code: C

Original Comment #:

Comment: According to this section, a Certification Report will be issued when all CUs within the scope of this CDL has passed certification. This contrasts what is proposed in Section 1.0 (lines 27-30), which states that a separate Certification Report *will not be submitted* for this CDL. Please clarify.